

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

vs.

JOHN GOMEZ VILLALBA,
a/k/a "John R. Gomez"

CRIMINAL NO. 6:24-737

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 1956(b)

18 U.S.C. § 1956(h)

18 U.S.C. § 982(a)(1)

28 U.S.C. § 2461(c)

SEALED INDICTMENT

Count 1

(Conspiracy to Commit Money Laundering)

THE GRAND JURY CHARGES:

1. That beginning at a time unknown to the grand jury, but beginning at least in or around August 2022, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a "John R. Gomez,"** did knowingly combine, conspire, and agree with other persons, both known and unknown to the grand jury, to commit offenses against the United States, in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, a conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841 and 846, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, and control of the proceeds of the specified

unlawful activity, and that while conducting such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

2. The Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** is an international money launderer with a permanent residential address in Aventura, Florida.

3. The Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** is an authorized person associated with a company called Payless 12, LLC, which is a Limited Liability Company (LLC) established in the State of Florida on or about August 1, 2022.

4. The Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** and Payless 12, LLC, have bank accounts with JP Morgan Chase and Bank of America.

5. As part of his scheme, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** would travel to different states, to include the District of South Carolina, to collect drug proceeds. After collecting the drug proceeds, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** would deposit the drug proceeds into bank accounts by in-person, teller transactions and ATM deposits. Once enough funds were deposited into the bank accounts, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** would transfer the proceeds using wire transactions to entities both inside and outside of the United States. The Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** would often transfer drug proceeds to a company within the United States for the purpose of converting the United States Dollar (USD) fiat currency to USD Coin, which is a regulated digital currency that can be redeemed 1:1 for USD.

The USD Coin would often then be transferred to a global cryptocurrency exchange located outside of the United States.

6. In sum, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** would travel to different districts within the United States, to include the District of South Carolina, to obtain money derived from drug sales. Then, to conceal or disguise the nature, location, source, ownership, and control of the drug proceeds, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** would move the illicit funds through a financial institution, which would immediately separate the funds from the person who sold the drugs. Thereafter, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** would wire transfer the USD fiat currency to different entities, including an entity in the United States which was able to convert the USD fiat currency to USD Coin. The USD Coin would then be sent to a cryptographic wallet associated with a third party, which further distanced the money from the original drug distributor. These actions were done with the intent to conceal or disguise the nature, location, source, ownership, and control of the drug proceeds.

All in violation of Title 18, United States Code, Section 1956(h).

Counts 2–5
(Money Laundering)

THE GRAND JURY FURTHER CHARGES:

7. Paragraphs 1–6 of this Indictment are incorporated herein by reference.

8. On or about the dates set forth below, in the District of South Carolina, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** with the intent to conceal or disguise the nature, location, source, ownership, or control of property known to be the proceeds of a specified unlawful activity, did knowingly and willfully conduct and attempt to conduct

financial transactions affecting interstate commerce as set forth below, each of which involved the proceeds of an unlawful activity, to wit, the knowing and unlawful distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and that while conducting such financial transactions, knew that the property involved in the financial transactions was the proceeds of some form of unlawful activity:

| <u>Count</u> | <u>Defendant</u> | <u>Date</u> (on or about) | <u>Nature of Transaction</u> |
|--------------|---|------------------------------|--|
| 2 | JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez” | January 18, 2024 | \$1,000 ATM deposit into Bank of America account 8981184172321 |
| 3 | JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez” | January 19, 2024 | \$7,100 ATM deposit into Bank of America account 8981184172321 |
| 4 | JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez” | January 19, 2024 | \$5,940 ATM deposit into Bank of America account 8981184172321 |
| 5 | JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez” | January 19, 2024 | \$980 ATM deposit into Bank of America account 8981184172321 |

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(b).

FORFEITURE**MONEY LAUNDERING:**

Upon conviction for violation of Title 18, United States Code, Section 1956, as charged in this Indictment, the Defendant, **JOHN GOMEZ VILLALBA, a/k/a “John R. Gomez,”** shall forfeit to the United States any property, real or personal, constituting, derived, from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offenses and any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, as charged in the Indictment.

PROPERTY:

Pursuant to Title 18, United States Code, Section 982(a)(1), and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Indictment includes, but is not limited to, the following:

Money Laundering/Forfeiture Judgment:

A sum of money equal to all property involved in the money laundering offenses charged in the Indictment, and all interest and proceeds traceable thereto as a result of his violation of 18 U.S.C. § 1956.

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- (1) Cannot be located upon the exercise of due diligence;
- (2) Has been transferred or sold to, or deposited with a third party;
- (3) Has been placed beyond the jurisdiction of the Court;
- (4) Has been substantially diminished in value; or
- (5) Has been commingled with other property which cannot be subdivided without difficulty.

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), (incorporating Title 21, United States Code, Section 853(p)), to seek forfeiture of any other property of the said Defendant up to the value of the above forfeitable property.

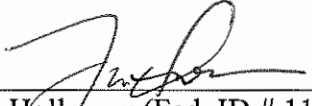
Pursuant to Title 18, United States Code, Section 982(a)(1) and Title 28, United States Code, Section 2461(c).

A true BILL

REDACTED

FOREPERSON

ADAIR F. BOROUGHES
UNITED STATES ATTORNEY

By: 
Justin W. Holloway (Fed. ID # 11684)
Assistant United States Attorney
55 Beattie Place, Suite 700
Greenville, SC 29601
Tel.: 864-268-2100
Email: justin.holloway@usdoj.gov